

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL; et al.,)	
)	
Plaintiffs,)	
)	Case No. 09-CV-1221
v.)	
)	
INVESTFORCLOSURES FINANCIAL, L.L.C.; et al.,)	Judge Leinenweber
)	
)	Magistrate Judge Nolan
)	
Defendants.)	

LR 37.2 CERTIFICATION OF ROBERT C. THURSTON

I, Robert C. Thurston, an attorney and counsel for Plaintiffs, hereby certify as follows:

1. On March 31, 2009, I served Plaintiffs' First Set of Interrogatories – Preliminary Injunction Phase and Plaintiffs' First Request for Production of Documents - Preliminary Injunction Phase directed to Defendant Francis Sanchez ("Sanchez") upon counsel via email. (True and correct copies of the discovery requests are attached hereto as Exhibit A.)
2. Pursuant to Federal Rules of Civil Procedure 33(b)(2) and 34(b)(2), the responses thereto were due on April 30, 2009.
3. Having received no responses by the due date, I sent an email on May 4, 2009 to Robert Christie, attorney for Sanchez, and copied all counsel of record inquiring as to when responses would be served. (A true and correct copy of May 4, 2009 email is attached hereto as Exhibit B.)
4. On May 7, 2009, I received Sanchez's responses to discovery, which amounted to nothing more than two objections; that the discovery was propounded on behalf of "Plaintiffs' Class" and no class had been certified in this matter as yet,

and that service was made by email and Sanchez had not waived service by mail pursuant to Rule 5(a)(2)(E). (True and correct copies of Sanchez's responses to discovery are attached hereto as Exhibit C.)

5. On May 7, 2009, via email and regular mail I sent a letter to attorney Christie requesting a LR 37.2 meet and confer via telephone on May 11, 2009 to discuss the objections. (A true and correct copy of the May 7, 2009 letter is attached hereto as Exhibit D.)

6. By email dated May 8, 2009, attorney Christie agreed to a telephone meet and confer at 2:00 pm on May 11, 2009. (A true and correct copy of the May 8, 2009 email is attached hereto as Exhibit E.)

7. At 2:00 pm on May 11, 2009, I dialed the telephone number Mr. Christie listed in his email as his office, 312-986-6957, to conduct such meet and confer. Additionally on the call was my co-counsel Joel Weiner.

8. During such conference, attorney Christie confirmed that his client will stand on the objection that the discovery was served by "Plaintiffs' Class" and that there is no existing entity and Sanchez will not provide responses to discovery on that basis.

9. During such conference, attorney Christie stated that service of the discovery via email is a moot issue because the discovery was served by a non-entity and therefore was not served at all.

10. I proposed a compromise that I would re-serve the discovery requests on behalf of the existing plaintiffs via regular mail and Sanchez would respond to such discovery in seven (7) days from service. Christie agreed to provide a response to the proposed compromise by 12:00 noon on May 12, 2009.

11. By email dated May 12, 2009 received at 12:09 pm, Christie informed me that his client rejected the proposed compromise of the discovery dispute and would not agree to expedited discovery. (A true and correct copy of the May 12, 2009 email is attached hereto as Exhibit F.)

12. I make this Certificate to affirm that I have made good faith efforts to resolve the discovery dispute pursuant to LR 37.2, but opposing counsel has elected not to participate in good faith in such efforts and that only I proposed a compromise to the dispute, which was rejected by Defendant Sanchez.

/s/ Robert C. Thurston
Robert C. Thurston

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL; et al.,)	
)	
Plaintiffs,)	
)	Case No. 09-CV-1221
v.)	
)	
INVESTFORCLOSURES FINANCIAL,)	Judge Leinenweber
L.L.C.; et al.,)	
)	Magistrate Judge Nolan
)	
Defendants.)	

FIRST SET OF INTERROGATORIES – PRELIMINARY INJUNCTION PHASE

Plaintiffs' Class, by and through their attorneys, Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, propound the following First Set of Interrogatories to be answered under oath by Defendant, Francis X. Sanchez ("Sanchez") within 30 days after service hereof pursuant to Rule 33 of the Federal Rules of Civil Procedure ("F.R.C.P.").

DEFINITIONS AND INSTRUCTIONS

In connection with these Interrogatories, the following definitions apply when such are applicable:

1. "Identify" means: (a) with respect to an individual, to state the individual's name, last known address, social security number, last known telephone number, last known email address, last known employer, last known title of employment, and dates of employment; (b) with respect to an entity other than an individual, to state the entity's name and the address of the entity's principal place of business; (c) with respect to a document, to state the type of document, date of the document, author of the document, senders and receivers of the document and a summary of the contents of the document; and (d) with respect to a communication, to state: (i) whether the communication was oral, written or both written and oral; (ii) the identity of the individuals who were parties to the communication; (iii) the date(s) of the communication; (iv) the substance of the communication; and (v) the type or title of any document (*e.g.* memorandum, letter, note, etc.) that constitutes all or a part of any written communication.

2. "Person" or "persons" means any individual or entity, including, but not limited to partnerships, associations, corporations, or any other form of business or any body of government or instrumentality or subdivision thereof.

3. As used herein, "Related to" or "Relating to" means referring to, recording, reflecting upon or in any way logically or factually connected with the matters discussed.
4. "You," "Your" and/or "Sanchez" refers to Francis X. Sanchez aka Frank Sanchez and legal counsel and other agents acting on the behalf of any of the foregoing.
5. "Complaint" means the currently pending Complaint filed in this action.
6. "Answer" shall mean any and all Answers, Affirmative Defenses or other responsive pleadings to the currently pending Complaint on file with the Court.
7. "ROI Mexico" means Realty Opportunities International S. de R.L. de C.V., Realty Opportunities International, ROI Mexico, Sands of Gold Estates and each of their predecessors, parent companies, subsidiaries, affiliated companies, successors in interest, and/or their members, shareholders, directors, officers, agents, representatives, and control group employees.
8. The term "Party" or "Parties" shall mean and include each and every Plaintiff and Defendant, collectively.
9. The term "Communication" means any oral, written or electronic transmission of information, opinion, belief, idea or statement, including, but not limited to, letters or correspondence, conversations, meetings, discussions, telephone calls, telegrams, telecopies, telexes, seminars, conferences, messages, notes, e-mails or memoranda.
10. The term "or" is meant to include the term "and" if that interpretation would call for the further disclosure of additional information, and vice versa.
11. The term "all" is meant to include the term "any" if that interpretation would call for the further disclosure of additional information, and vice versa.
12. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine as appropriate and vice versa.
13. Unless stated otherwise, information requested by these Interrogatories is for the period January 1, 2000 to the present and continuing forward pursuant to F.R.C.P. 26(e).
14. Pursuant to F.R.C.P. 26(e), these Interrogatories shall be deemed continuing so as to require supplemental responses should you or your attorney obtain further information between the time responses are served and the time of trial.

15. In answering these interrogatories, furnish not merely information available from your personal knowledge, but all information available to you, including information in the possession of your attorneys, agents, investigators, and all persons acting on your behalf. If you cannot answer the interrogatories in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

16. "Document" is used in the broadest possible sense and means, including without limitation all documents, copies of documents, correspondence, letters, telephone messages, voicemail messages, electronic mail ("email") messages, facsimiles / faxes, electronic files and documents, including without limitation spreadsheets, databases, Portable Document Format files, raw data, and attachments thereto. A draft or non-identical copy of a document, including an otherwise identical copy but for handwritten matter, is a separate document within the meaning of this term.

17. If you are producing electronic documents and/or email in lieu of a written response to these Interrogatories, you are instructed that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater. Production of electronic data or documents shall be in compliance with The Sedona Conference® Cooperation Proclamation (July 2008) and/or any Standing Order of this Court on electronic discovery.

18. If any information requested by these Interrogatories is claimed to be immune from discovery on the grounds of privilege or otherwise:

- a. identify the communication or document or source of information;
- b. identify the person or persons making the communication or authoring the document and all persons receiving the documents;
- c. specify the type of privilege or other reason asserted for withholding the requested information;
- d. specify the basis for the assertion; and
- e. describe the withheld information to a degree sufficient to enable the court to decide if any such claim has been properly invoked.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person that supplied information to respond to these Interrogatories, indicating to which Interrogatory such person's information was responsive, as well as each person's employer, title, current residence address, date of birth, driver's license number and issuing state, and last four digits of their social security number, and, if different, give the full name, as

well the current residence address, date of birth, driver's license number and issuing state, and last four digits of the social security number of the individual signing these answers.

ANSWER:

INTERROGATORY NO. 2: Identify each person that is or was a witness or that has any information relating to any of the events that are the subject of this suit.

ANSWER:

INTERROGATORY NO. 3: Identify every bank account or financial institution, including those in any foreign country, at which an account is or was held in the name of any of the following entities:

- (a) InvestForClosures Financial, L.L.C.
- (b) ROI Developers
- (c) InvestForClosures
- (d) InvestForClosures.com, LLC
- (e) InvestForClosures Ventures, LLC
- (f) Sands of Gold Escrow
- (g) Sands of Gold
- (h) ROI Financial
- (i) Realty Opportunities International Escrow 23
- (j) ROI Escrow
- (k) Realty Opportunities International S. de R.L. de C.V.
- (l) Realty Opportunities International
- (m) ROI Mexico
- (n) Sands of Gold Estates

ANSWER:

INTERROGATORY NO. 4: Explain why the investors in InvestForClosures Financial, L.L.C., InvestForClosures.com, LLC, and/or InvestForClosures Ventures, LLC have not yet received the return of principal or interest on their respective investments.

ANSWER:

INTERROGATORY NO. 5: Identify all assets of ROI Mexico, including without limitation land holdings, options to purchase land, bank accounts, investments, and other cash or property assets, and in what manner of control or ownership those assets are held.

ANSWER:

INTERROGATORY NO. 6: Identify all current and former members, shareholders, officers, directors, employees and agents of the following entities:

- (o) InvestForClosures Financial, L.L.C.
- (p) ROI Developers
- (q) InvestForClosures
- (r) InvestForClosures.com, LLC
- (s) InvestForClosures Ventures, LLC
- (t) Sands of Gold Escrow
- (u) Sands of Gold
- (v) ROI Financial
- (w) Realty Opportunities International Escrow 23

- (x) ROI Escrow
- (y) Realty Opportunities International S. de R.L. de C.V.
- (z) Realty Opportunities International
- (aa) ROI Mexico
- (bb) Sands of Gold Estates

ANSWER:

INTERROGATORY NO. 7: Identify the present corporate or legal organizational status of each of the following entities and if they are dissolved or no longer active entities, explain why:

- (a) InvestForClosures Financial, L.L.C.
- (b) ROI Developers
- (c) InvestForClosures
- (d) InvestForClosures.com, LLC
- (e) InvestForClosures Ventures, LLC
- (f) Sands of Gold Escrow
- (g) Sands of Gold
- (h) ROI Financial
- (i) Realty Opportunities International Escrow 23
- (j) ROI Escrow
- (k) Realty Opportunities International S. de R.L. de C.V.
- (l) Realty Opportunities International
- (m) ROI Mexico
- (n) Sands of Gold Estates

ANSWER:

INTERROGATORY NO. 8: Identify "Mark Wilk" whose name appears as a manager of ROI Developers, LLC and as a former vice president of IFCF on Exhibit A attached hereto and the involvement such person had with any of the Defendants in this case.

ANSWER:

INTERROGATORY NO. 9: Provide an accounting of the source of all assets of ROI Mexico, including without limitation money and property and particularly the 27 acres in Playa Ventura and the options to purchase the 75 lots equaling roughly 1000 acres in Playa Ventura.

ANSWER:

INTERROGATORY NO. 10: Provide an accounting of all investments in InvestForClosures Financial, L.L.C., InvestForClosures.com, LLC and InvestForClosures Ventures, LLC from January 1, 2000 to the present.

ANSWER:

INTERROGATORY NO. 11: State whether InvestForClosures Financial, LLC ever had a federal tax lien placed upon it and, if your answer is anything other than an unequivocal no, identify the date, amount and reason for the tax lien.

ANSWER:

INTERROGATORY NO. 12: Explain what the term "operations" as used by Frank Sanchez means to explain where the investments received from investors were spent.

ANSWER:

INTERROGATORY NO. 13: Identify "Francisco Gonzalez" whose name appears on an email thread with email address pacogs_05@hotmail.com in which the subject line is "IFCF & IFCV Investors – Final Confirmation and Trip Information" on Exhibit B attached hereto and the involvement such person had with any of the Defendants in this case.

ANSWER:

INTERROGATORY NO. 14: Identify all persons and/or entities involved in the development, financing and/or promotion of the Sands of Gold Estates project in Playa Ventura, Mexico, including without limitation any attorneys, realtors, builders, architects, banks, financing companies, private financiers, and government personnel or representatives.

ANSWER:

INTERROGATORY NO. 15: Describe all meetings you or any representative of ROI Mexico has had with Felipe Calderon or any other government personnel or representative regarding development of the Sands of Gold Estates project in Playa Ventura, Mexico, setting forth the date, time, location of and discussions that took place during such meetings.

ANSWER:

PLAINTIFFS' CLASS

By: /s/ Robert C. Thurston
One of Their Attorneys

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Phone: 847-654-3105
Fax: 847-358-7165
Email: jweiner@jweinerlaw.com

CERTIFICATE OF SERVICE

I, Robert C. Thurston, an attorney, hereby certify that I served this First Set of Interrogatories – Preliminary Injunction Phase by sending a copy via email to all members of the Service List below on March 31, 2009.

By: /s/ Robert C. Thurston
Robert C. Thurston

SERVICE LIST

Attorneys For Defendants

InvestForClosures Financial, L.L.C.;

InvestForClosures.com, LLC;

InvestForClosures Ventures, LLC;

Francis X. Sanchez; and James D.

Bourassa

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EXHIBIT A



These distressed properties were "fixer-uppers" that we rehabbed live on the Internet. It was an excellent idea that basically lost its luster after the market became flooded with out-of -executives that, because the price of money was so cheap, began taking out Home Equity Lines of Credit (HELOC) on their homes and started going into the rehab business. If they and their friend or wife or partner were able to complete at least one of these projects they could make anywhere from \$30,000 to 75,000 on one project and if they were really motivated maybe they could do 2 a year. The question is not how long it takes to do the project or even how much profit one would make. The question wound up being how long one had to sit on the house before it sold and the principal was recaptured.

Given these new market conditions we started to do new construction. Once again because of the low interest rates it made more sense for people to purchase a new home in the same neighborhood as our rehab projects because, even though our rehabbed houses were completely refurbished like a new home, the fact of the matter is, they weren't new. For an additional 30 or 40 thousand dollars a homebuyer could have a new home and their mortgage payment would only be a little more than if they bought a rehabbed property.

Focusing on New Construction

New construction gives us the potential for higher returns because we are able to leverage a loan at the bank (this was more difficult when the company started because the banks wanted a track record in order to be credit worthy) and create a higher ROI. For example: a home costs us \$165,000 to construct, including the lot. The bank will finance the home with a 25% down payment (\$41,250.00), we discount it for a quick sale and sell it for \$195,000 or a profit of \$30,000 creating a profit of about 72% on a "cash-in" basis. Also, new construction remains affordable compared to existing property, today's consumer demands new housing first, and will only settle for rehabbed if they wish to move into an existing neighborhood. Such factors mandate launching ROI Developers, L.L.C.

ROI Developers, LLC

 ROI Developers, L.L.C. designs, constructs, and markets quality built homes that provide new homeowners a lifestyle of comfort and luxury. ROI Developers will focus only on new construction in the U.S. market. The company will take advantage of the years of experience of the founders and managers. We have appointed Scott Wessel and Mark Wilk (former vice presidents of IFCF) to be the managers of this company.  They will both run the day-to-day operations and seek out new investment and development opportunities on a National basis. Both have proven themselves to be outstanding employees of IFCF and we feel they will do an excellent job as Managers of ROI.

Located in McHenry County, Illinois, ROI Developers benefits from being in the middle of one of the top ten fastest growing counties in the United States. Locally, homes are being produced and sold in record numbers. Furthermore, ROI Developers is only minutes from undeveloped, yet prime land that will be cost effective to develop, and

EXHIBIT B

From: "Jim Bourassa" <jimdonaldbourassa@hotmail.com>
To: investor@investforclosures.com
Cc: "Francisco Gonzalez" <pacogs_05@hotmail.com>, "Frank Sanchez"
<francisxsanchez@hotmail.com>
Subject: IFCF & IFCV Investors - Final Confirmation and Trip Information
Date: Mon, 2 Jul 2007 15:52:41 -0500

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

BRADLEY J. SCHAUFENBUEL; et al.,)	
)	
Plaintiffs,)	
)	Case No. 09-CV-1221
v.)	
)	
INVESTFORCLOSURES FINANCIAL, L.L.C.; et al.,)	Judge Leinenweber
)	
)	Magistrate Judge Nolan
)	
Defendants.)	

**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS– PRELIMINARY
INJUNCTION PHASE**

Plaintiffs' Class, by and through their attorneys, Thurston Law Offices, P.C. and Law Offices of Joel M Weiner, LLC, hereby requests that Defendant, Francis X. Sanchez ("Sanchez"), produce documents identified below at Thurston Law Offices, P.C., 10469 Bethel Avenue, Huntley, IL 60142 within 30 days after service hereof pursuant to Rule 34 of the Federal Rules of Civil Procedure ("F.R.C.P.").

DEFINITIONS AND INSTRUCTIONS

1. "Person" or "persons" means any individual or entity, including, but not limited to partnerships, associations, corporations, or any other form of business or any body of government or instrumentality or subdivision thereof.
2. As used herein, "Related to" or "Relating to" means referring to, recording, reflecting upon or in any way logically or factually connected with the matters discussed.
3. "You," "Your" and/or "Sanchez" refers to Francis X. Sanchez aka Frank Sanchez and legal counsel and other agents acting on the behalf of any of the foregoing.
4. "Complaint" means the currently pending Complaint filed in this action.
5. "Answer" shall mean any and all Answers, Affirmative Defenses or other responsive pleadings to the currently pending Complaint on file with the Court.
6. "ROI Mexico" means Realty Opportunities International S. de R.L. de C.V., Realty Opportunities International, ROI Mexico, Sands of Gold Estates and each of their predecessors, parent companies, subsidiaries, affiliated companies,

successors in interest, and/or their members, shareholders, directors, officers, agents, representatives, and control group employees.

7. The term "Party" or "Parties" shall mean and include each and every Plaintiff and Defendant, collectively.

8. The term "Communication" means any oral, written or electronic transmission of information, opinion, belief, idea or statement, including, but not limited to, letters or correspondence, conversations, meetings, discussions, telephone calls, telegrams, telecopies, telexes, seminars, conferences, messages, notes, e-mails or memoranda.

9. The term "or" is meant to include the term "and" if that interpretation would call for the further disclosure of additional information, and vice versa.

10. The term "all" is meant to include the term "any" if that interpretation would call for the further disclosure of additional information, and vice versa.

11. Use of the singular shall be deemed to include the plural, and use of the masculine shall be deemed to include the feminine as appropriate and vice versa.

12. Unless stated otherwise, information requested by these Requests is for the period January 1, 2000 to the present and continuing forward pursuant to F.R.C.P. 26(e).

13. Pursuant to F.R.C.P. 26(e), these Requests shall be deemed continuing so as to require supplemental responses should you or your attorney obtain further information between the time responses are served and the time of trial.

14. In answering these Requests, furnish not merely information available from your personal knowledge, but all information available to you, including information in the possession of your attorneys, agents, investigators, and all persons acting on your behalf. If you cannot answer the Requests in full after exercising due diligence to secure the information, so state and answer to the extent possible, specifying the reason for your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

15. "Document" is used in the broadest possible sense and means, including without limitation all documents, copies of documents, correspondence, letters, telephone messages, voicemail messages, electronic mail ("email") messages, facsimiles / faxes, electronic files and documents, including without limitation spreadsheets, databases, Portable Document Format files, raw data, and attachments thereto. A draft or non-identical copy of a document, including an otherwise identical copy but for handwritten matter, is a separate document within the meaning of this term.

16. If you are producing electronic documents and/or email in lieu of a written response to these Requests, you are instructed that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater. Production of electronic data or documents shall be in compliance with The Sedona Conference® Cooperation Proclamation (July 2008) and/or any Standing Order of this Court on electronic discovery.

17. If any information requested by these Requests is claimed to be immune from discovery on the grounds of privilege or otherwise:

- a. identify the communication or document or source of information;
- b. identify the person or persons making the communication or authoring the document and all persons receiving the documents;
- c. specify the type of privilege or other reason asserted for withholding the requested information;
- d. specify the basis for the assertion; and
- e. describe the withheld information to a degree sufficient to enable the court to decide if any such claim has been properly invoked.
- f. If you are producing electronic documents and/or email, Plaintiff/Defendants request that if such information is stored in Microsoft Office 2003 or lesser format you shall produce it in its native format on CDs or DVDs readable by Microsoft Windows 2000 or greater. If the data is stored in another format, Plaintiff/Defendants request that the information be produced in multi-page Adobe Portable Document Format (PDF) version 5.0 or greater on CDs or DVDs readable by Microsoft Windows 2000 or greater.

DOCUMENT REQUESTS

REQUEST NO. 1: All documents relating to the formation, operation and dissolution, if applicable, of the following entities:

- (a) InvestForClosures Financial, L.L.C.
- (b) ROI Developers
- (c) InvestForClosures
- (d) InvestForClosures.com, LLC
- (e) InvestForClosures Ventures, LLC
- (f) Sands of Gold Escrow

- (g) Sands of Gold
- (h) ROI Financial
- (i) Realty Opportunities International Escrow 23
- (j) ROI Escrow
- (k) Realty Opportunities International S. de R.L. de C.V.
- (l) Realty Opportunities International
- (m) ROI Mexico
- (n) Sands of Gold Estates

RESPONSE:

REQUEST NO. 2: All materials used to solicit investments in the entities listed in Request No. 1, including without limitation marketing materials, prospecti, brochures, web pages, and investment summaries.

RESPONSE:

REQUEST NO. 3: All documents that show investments in the entities listed in Request No. 1, including without limitation investment certificates, stock, investment plans, powers of attorney, and other documents signed by investors.

RESPONSE:

REQUEST NO. 4: All documents, including without limitation statements, for every bank account or financial institution, including those in any foreign country, at

which an account is or was held in the name of any of the entities listed in Request No. 1 and Francis X. Sanchez or Frank Sanchez.

RESPONSE:

REQUEST NO. 5: All documents which show the assets of ROI Mexico, including without limitation land holdings, options to purchase land, bank accounts, investments, and other cash or property assets, and in what manner of control or ownership those assets are held.

RESPONSE:

REQUEST NO. 6: An accounting of all investments in InvestForClosures Financial, L.L.C., InvestForClosures.com, LLC and InvestForClosures Ventures, LLC from January 1, 2000 to the present.

RESPONSE:

REQUEST NO. 7: An accounting of the source of all assets of ROI Mexico, including without limitation money and property and particularly the 27 acres in Playa Ventura and the options to purchase the 75 lots equaling roughly 1000 acres in Playa Ventura.

RESPONSE:

REQUEST NO. 8: All materials used to solicit investments in the Sands of Gold Estates project in Playa Ventura, Mexico, including without limitation marketing materials, prospecti, brochures, web pages, and investment summaries.

RESPONSE:

REQUEST NO. 9: All materials used to sell lots or options for lots in the Sands of Gold Estates project in Playa Ventura, Mexico, including without limitation marketing materials, prospecti, brochures, web pages, and investment summaries.

RESPONSE:

REQUEST NO. 10: All documents provided to persons who purchased lots or options for lots in the Sands of Gold Estates project in Playa Ventura, Mexico, including without limitation deeds, contracts, certificates, or other representations of ownership interests.

RESPONSE:

REQUEST NO. 11: All documents that show attempts by InvestForClosures Ventures, LLC and/or ROI Mexico to obtain financing for the Sands of Gold Estates project in Playa Ventura, Mexico, including without limitation applications for loans, letters, letters of credit, financial statements, presentations, and communications relating to the "Stand-By Letter of Credit," and which identify the organizations or entities to whom such attempts were made.

RESPONSE:

REQUEST NO. 12: All documents that show responses by organizations, individuals and/or entities to the attempts by InvestForClosures Ventures, LLC and/or ROI Mexico to obtain financing for the Sands of Gold Estates project in Playa Ventura, Mexico.

RESPONSE:

PLAINTIFFS' CLASS

By: /s/ Robert C. Thurston
One of Their Attorneys

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Email: jweiner@jweinerlaw.com

CERTIFICATE OF SERVICE

I, Robert C. Thurston, an attorney, hereby certify that I served this First Request for Production of Documents – Preliminary Injunction Phase by sending a copy via email to all members of the Service List below on March 31, 2009.

By: /s/ Robert C. Thurston
Robert C. Thurston

SERVICE LIST

Attorneys For Defendants
InvestForClosures Financial, L.L.C.;
InvestForClosures.com, LLC;
InvestForClosures Ventures, LLC;
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glynott@ccdllaw.com

EXHIBIT B

TJ Thurston

From: TJ Thurston [tj@thurstonlawpc.com]
Sent: Monday, May 04, 2009 7:52 PM
To: 'Genevieve Lynott'; Joel M. Weiner (jweiner@jweinerlaw.com); 'Robert Christie'; 'Russell Baker'
Subject: Schaufenbuel, et al. v. InvestForClosures, et. al - Discovery Responses Sanchez

Mr. Christie:

By my calculations, Mr. Sanchez's responses to discovery were due on April 30, 2009. I have yet to receive them. In advance of a Rule 37.2 conference, can you please advise when I can expect to receive such responses. If the responses are not received by this Friday or you cannot commit to service by such date, I am requesting a Rule 37.2 conference on Monday, May 11, 2009 via telephone to meet and confer on the issue.

Thank you. And God Bless You.

Robert C. ("TJ") Thurston
Thurston Law Offices, P.C.

10469 Bethel Avenue
Huntley, IL 60142
p 847.659.8613
f 847.628.0930
c 630.853.3744

tj@thurstonlawpc.com

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EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL, *et. al.*,

Plaintiffs,

v.

Case No. 09 cv 1221

INVESTFORCLOSURES FINANCIAL, L.L.C.,
et. al.,

Defendants.

**FRANCIS SANCHEZ'S RESPONSE TO
PLAINTIFFS CLASS' INTERROGATORIES**

Defendant Francis Sanchez, through his attorneys and as his responses to interrogatories tendered by a purported "Plaintiffs' Class," state as follows:

Defendant objects to Interrogatories tendered to the Defendant by the alleged "Plaintiffs' Class" because no such class has been certified in this matter, and thus the purported "Plaintiffs' Class" lacks standing to submit discovery requests in this matter, resulting in the same effect as if no requests were ever proffered.¹

Respectfully submitted,

By:

One of Defendant's Attorneys

Robert B. Christie
HENDERSON & LYMAN
175 West Jackson, Suite 240
Chicago, Illinois 60604
312-986-6957

¹ In addition, service on the Defendant was improper, because service was attempted on Defendant's attorney by way of electronic means, and yet Defendant has not agreed to electronic service, as required Under Rule 5(a)(2)(E). Defendant states in the affirmative that this Response is not intended as a waiver to the requirements set forth in Rule 5(a)(2)(E).

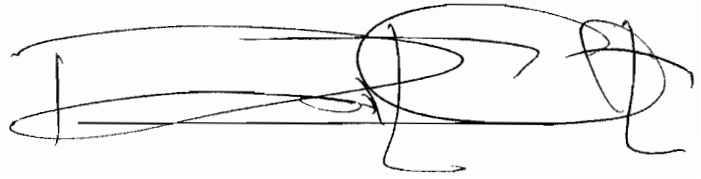
CERTIFICATE OF SERVICE

To:

Robert Craig Thurston
Thurston Law Offices, P.C.
10469 Bethel Avenue
Huntley , IL 60142

Russell Wade Baker
Campion, Curran, Dunlop & Lamb, P.C.
8600 U.S. Route 14, Suite 201
Crystal Lake , IL 60012

I, the undersigned, an attorney at law, certify that I served a copy of Francis Sanchez's Response to Plaintiffs Class' Interrogatories to the individuals listed above at the addresses stated by depositing same in the U.S. mail at 175 West Jackson Street, Chicago, Illinois, with proper postage prepaid on May 5, 2009, in accordance with Rule 5(a) of the Federal Rules of Civil Procedure.

A handwritten signature in black ink, appearing to be "J. R. Baker", written over a horizontal line.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BRADLEY J. SCHAUFENBUEL, *et. al.*,

Plaintiffs,

v.

INVESTFORCLOSURES FINANCIAL, L.L.C.,
et. al.,

Defendants.

Case No. 09 cv 1221

**FRANCIS SANCHEZ'S RESPONSE TO
PLAINTIFFS CLASS' DOCUMENT REQUEST**

Defendant Francis Sanchez, through his attorneys and as his responses to the document requests tendered by a purported "Plaintiffs' Class," states as follows:

Defendant objects to the document requests tendered to the Defendant by the alleged "Plaintiffs' Class" because no such class has been certified in this matter, and thus the purported "Plaintiffs' Class" lacks standing to submit discovery requests in this matter, resulting in the same effect as if no requests were ever proffered.¹

Respectfully submitted,

By:

One of Defendant's Attorneys

Robert B. Christie
HENDERSON & LYMAN
175 West Jackson, Suite 240
Chicago, Illinois 60604
312-986-6957

¹ In addition, service on the Defendant was improper, because service was attempted on Defendant's attorney by way of electronic means, and yet Defendant has not agreed to electronic service, as required Under Rule 5(a)(2)(E). Defendant states in the affirmative that this Response is not intended as a waiver to the requirements set forth in Rule 5(a)(2)(E).

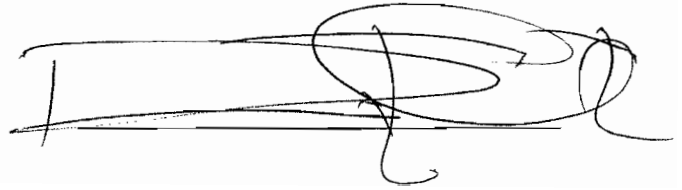
CERTIFICATE OF SERVICE

To:

Robert Craig Thurston
Thurston Law Offices, P.C.
10469 Bethel Avenue
Huntley, IL 60142

Russell Wade Baker
Campion, Curran, Dunlop & Lamb, P.C.
8600 U.S. Route 14, Suite 201
Crystal Lake, IL 60012

I, the undersigned, an attorney at law, certify that I served a copy of Francis Sanchez's Response to Plaintiffs Class' Document Request to the individuals listed above at the addresses stated by depositing same in the U.S. mail at 175 West Jackson Street, Chicago, Illinois, with proper postage prepaid on May 5, 2009, in accordance with Rule 5(a) of the Federal Rules of Civil Procedure.

A handwritten signature in black ink, appearing to be "J. P. [unclear]", written over a horizontal line.



THURSTON LAW OFFICES, P.C.

10469 BETHEL AVENUE
HUNTLEY, IL 60142
WWW.THURSTONLAWPC.COM

EXHIBIT D

PHONE: 847.659.8613
FAX: 847.628.0930
CELL: 630-853-3744

ROBERT C. ("T.J.") THURSTON
ATTORNEY-AT-LAW
EMAIL: TJ@THURSTONLAWPC.COM

May 7, 2009

VIA EMAIL AND REGULAR MAIL

Robert B. Christie
Henderson & Lyman
175 West Jackson Blvd, Suite 240
Chicago, IL 60604

**RE: Schaufenbuel, et al. v. InvestForClosures, et al.
U.S.D.C. N.D.IL. Case No. 09-cv-1221**

Dear Mr. Christie:

I am in receipt of your client Francis Sanchez's responses to Interrogatories and Request for Production of Documents. Pursuant to LR 37.2, I am requesting a telephone conference to discuss the responses and specifically whether your client intends to rely on the objections that the discovery requests were served on behalf of "Plaintiffs' Class" and because there is no certified class that your client will not respond and that service was by email which you have not agreed to in this case.

I do intend to file a motion to compel to challenge your objections, but we are required by rule to meet and confer by telephone or in person prior to filing such motion. I am requesting such conference be held on Monday, May 11, 2009 at a time convenient to you. Please advise as to the time you are available.

Very truly yours,

Robert C. ("T.J.") Thurston

cc: Joel Weiner (via email only)
Russell Baker (via email only)

EXHIBIT E

TJ Thurston

From: Robert Christie [RChristie@henderson-lyman.com]
Sent: Friday, May 08, 2009 2:23 PM
To: tj@thurstonlawpc.com
Cc: Genevieve Lynott; Joel M. Weiner; Russell Baker
Subject: RE: Schaufenbuel, et al. v. InvestForClosures, et. al - Discovery Responses Sanchez

Dear Mr. Thurston:

Because of a previously scheduled appointment, I most likely will not be in the office before noon. However, I should be available at 2:00 p.m. to take your call. If for some reason you are not able to reach me, please leave a voice mail message and I will call you back as soon as possible.

Sincerely,
Bob Christie

Robert B. Christie
Henderson & Lyman
175 West Jackson Boulevard
Suite 240
Chicago, IL 60604

Phone (312) 986-6960
Direct (312) 986-6957
Facsimile (312) 986-6961
email: rchristie@henderson-lyman.com
web site: www.henderson-lyman.com

New York Office
152 West 57th Street
18th Floor
New York, NY 10019

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From: TJ Thurston [mailto:tj@thurstonlawpc.com]
Sent: Monday, May 04, 2009 7:52 PM
To: 'Genevieve Lynott'; Joel M. Weiner; Robert Christie; 'Russell Baker'
Subject: Schaufenbuel, et al. v. InvestForClosures, et. al - Discovery Responses Sanchez

Mr. Christie:

By my calculations, Mr. Sanchez's responses to discovery were due on April 30, 2009. I have yet to receive them. In advance of a Rule 37.2 conference, can you please advise when I can expect to receive such responses. If the responses

are not received by this Friday or you cannot commit to service by such date, I am requesting a Rule 37.2 conference on Monday, May 11, 2009 via telephone to meet and confer on the issue.

Thank you. And God Bless You.

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EXHIBIT F

TJ Thurston

From: Robert Christie [RChristie@henderson-lyman.com]
Sent: Tuesday, May 12, 2009 12:08 PM
To: tj@thurstonlawpc.com
Cc: jweiner@jweinerlaw.com; rbaker@ccdllaw.com
Subject: Schaufenbuel / InvestForClosures Financial

Dear Mr. Thurston:

In response to your inquiry yesterday, my clients are not in a position to agree to an expedited discovery schedule.

Sincerely,
Bob Christie

Robert B. Christie
Henderson & Lyman
175 West Jackson Boulevard
Suite 240
Chicago, IL 60604

Phone (312) 986-6960
Direct (312) 986-6957
Facsimile (312) 986-6961
email: rchristie@henderson-lyman.com
web site: www.henderson-lyman.com

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New York, NY 10019

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